

**EXHIBIT 1**

E-mail Correspondence – January 3, 2017 at 10:48 p.m. (ET)

**Allen, William Richard**

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**From:** XP VEHICLES <legal@xpvehicles.com>  
**Sent:** Tuesday, January 03, 2017 10:48 PM  
**To:** Agudelo, Jonathan  
**Subject:** Gawker Media LLC, et al., 1 : Case No. 16-11700 (SMB) RESPONSE TO ORDER TO  
SHOW CAUSE DIRECTING FILING OF STATEMENT PURSUANT TO FEDERAL  
BANKRUPTCY RULE 2019 AS A CONDITION TO BEING HEARD

XP GROUP AND RELATED PLAINTIFFS GROUP

Evidence Set, per BRANCHES public  
law center <http://www.globalscoop.net> Case # 2788-D

*In pro per Claimant and Plaintiff group requesting Court  
Appointed legal counsel or the provision of contingency litigators  
or deferral fee litigators*

Jan. 3, 2016

**UNITED STATES BANKRUPTCY COURT**

**SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11

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Gawker Media LLC, et al., <sup>1</sup> : Case No. 16-11700 (SMB)

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Debtors. : (Jointly Administered)

**RESPONSE TO ORDER TO SHOW CAUSE DIRECTING FILING OF STATEMENT PURSUANT TO FEDERAL BANKRUPTCY RULE 2019 AS A CONDITION TO BEING HEARD**

**WHEREAS**, Defendants Gawker Media, GMGI, Gawker Hungary (f/k/a Blogwire Hungary Szellemi Alkotast Hasznosito Kft.), Gawker Entertainment LLC, Gawker Technology, LLC, Gawker Sales, LLC, Nicholas G. A. Denton, Irin Carmon, Univision Communications, Univision America, Adrian Covert, Jon Herrman, Gaby Derbyshire, UniModa LLC, Elon Musk, John Doerr and DOES I through 220, including each employee of Gawker Media, did engage in RICO statute violations in their attempts to damage Plaintiffs.

**WHEREAS**, public officials and investigators have provided proof of RICO violations to all journalism, Congressional and law enforcement parties with jurisdiction in these charges.

**WHEREAS**, XP Vehicles Task Force is an alliance of Plaintiffs comprising some members of those parties in the evidence file set previously provided to the Court and all case parties located at <http://globalscoop.net> In folders A-1 to A-50 of those cloud-based evidence set files which have been provided to this court, Congress, the FBI and all related parties for the last year or more. Folder A-7 lists the parties damaged by name. There is no excuse for any party to this case saying that they cannot see those files as they are modeled on the same software as Prime Clerk uses and can be easily viewed on any browser used by the parties in this case.

**WHEREAS** the claim by XP Vehicles in the affiliated cases is the sum of \$175 million, that figure only represents cash and assets known to be on hand with Defendants. The true damages of taking down an entire automobile company and a global energy technology company exceeds many billions of dollars in damages and if larger sums of assets are tracked back to Defendants, then that sum shall be increased.

**WHEREAS** the Debtors moved to expunge the claims, Mr. Redmond and the XP Alliance filed collaboratively authored WIKI responses on behalf of the XP Vehicles Task Force. Hundreds of parties participate in the production of materials in a WIKI (see WIKIPEDIA as a specific example of the document production process using global shared collaborative research by hundreds of, or millions of web users). That is how some of the provided evidence submitted for this case has been authored. Many letters were sent to the Court, Prime Clerk, and the vast numbers of lawyers listed in this complaint but at no time except today from Chantel, did XP receive a reply, instructions, answers to questions or assistance from any person regarding in pro per assistance.

**WHEREAS** the Court conducted a hearing on December 1, 2016, which XP Vehicles had written the Court, in advance about, on multiple occasions requesting an opportunity to appear by phone, requesting the stated travel expenses or provision of court appointed counsel or references to Counsel for an in pro per, disadvantaged Plaintiff per State and Constitutional law rights , no response was provided to XP for those requests or in any way responsive to those requests. or which a representative of XP Vehicles Task Force did not appear but for which XP Vehicles, the main current Defendant had submitted complete responses and over a million pages of evidence in the case evidence files at <http://globalscoop.net>. XP provided more than enough evidence to make its point and hold it's position in this case prior to the deadline for the Dec. 1 hearing. If parties refused to look at the evidence including the provided report from the United States Congress, that is not XP Vehicles fault. XP was on-time, responsive to the best ability of an in pro per or is not allowed to have counsel due to black-listing

and Defendant-caused economic hardship as any in pro per in such circumstances could be against opponents with millions of dollars of opposition financing. As far as we can see, today, Jan. 3, 2016 is the first response to a question XP has received from the Court after months of trying to get any questions answered.

**WHEREAS**, it may appear to some that the Bankruptcy proceedings are a sham set-up to deliver hard-wired deals to big players so that the entire illicit Gawker operation can continue exactly as before via simple name change tricks, XP hopes that this is not the case. CODE RED operates a publishing group of hundreds of peer-to-peer publishers reaching millions of voting readers and has created a system to ensure that every voter and citizen in the world is fully aware of all of the merits, tricks, connections and true natures of Gawker Media. CODE RED has been distributing some of the very evidence for an even larger, and related case, through this case's Prime Clerk servers for over 22 law enforcement entities that XP is reporting to, in order to save time and provide a multi-functional case system.

**WHEREAS** the Court heard the argument by the Debtors' counsel, and refused to read XP's written response and refused to reply as to how XP could attend that hearing by phone or via the case authorized travel expenses, the Court expunged the claims in an unfair manipulation be Debtors counsel.

**WHEREAS** XP Vehicles not only alleged massive numbers of the facts in support of the conspiracy-related tort claims located at <http://globalscoop.net> In folders A-1 to A-50 of those cloud-based evidence set files which have been provided to this court, Congress, the FBI and all related parties for the last year or more. Folder A-7 lists the parties damaged by name. There is no excuse for any party to this case saying that they cannot, or have not read that evidence. In fact that evidence which wholly and fully supports the indisputable facts as alleged by XP Vehicles exceeds the amount of evidence known to have been provided by any other Claimant aside from Hulk Hogan. In fact a portion of the evidence comes from The U.S. Congress and federal law enforcement and is now under review by the Donald Trump Administration which begins Jan. 20, 2016.

**WHEREAS** defamation claims and attacks by Defendants have occurred as recently as this morning, it is ludicrous for Debtors counsel to claim that any aspect of this case is barred by the statute of limitations.

**WHEREAS** XP Vehicles not defunct.

**WHEREAS** The Court entered an order expunging the claims the next day. (Order Granting Debtors' Omnibus Objection to Proofs of Claim Filed by XP Vehicles Group, dated Dec. 2, 2016 (ECF Doc. # 529).) it appears that the Court did not read or consider XP filings and that Debtors Counsel may have hidden or obfuscated XP's appeal and counter-points materials

**WHEREAS** every email and submission provided by XP and the accompanying documents are 100% part of the Gawker case because Gawker (and its founder, Nicholas Denton) participated in a conspiracy to harm XP on behalf of Google, Inc, Elon Musk and Obama Administration officials because XP had shut down their felony attempted "Coup" designed to steer nearly a trillion dollars of government funds into their own personal bank accounts, per Congressional assertions.

**WHEREAS** the Court has caused the emails to be filed on the docket they provide not only no burden but essential data for ongoing Congressional and law enforcement hearings and the publication of those docketed materials are the FIRST AMENDMENT RIGHT of XP Vehicles to disclose NEWS that is important to the public.

**WHEREAS** XP Vehicles again requests in writing, to this court, the opportunity to appear at the January 26, 2017, 10:00 a.m., hearing in Room 723 of the United States Bankruptcy Court, New York, New York 10004. The Court never responded to previous requests nor did the Court respond to the request for a dial-in number for previous hearings. It is not fair to deny an in pro per, economically disadvantaged Plaintiff their rights to a

fair hearing in an age when the entire Black Lives Matter movement has the nation in an uproar about economically challenged people being denied equal access to the Justice System.

**WHEREAS** no order should be entered directing XP to comply with Federal Bankruptcy 16-11700-smb Doc 669 Rule 2019, and in the event of non-compliance, denying them the right to be heard pursuant to Federal Bankruptcy Rule 2019(e)(2)(A); without providing XP with equal rights in this Court. Why will this Court not respond to XP's requests for 1.) telephonic participation 2.) case travel expenses 3.) explanatory process assistance or 4.) assistance with provision of counsel for a disadvantaged, in pro-per Plaintiff who has been blacklisted and economically attacked by Defendants in reprisal for helping law enforcement.

**WHEREAS**, if no attorney can be provided by Court support or acquired it is fully legal for shareholder Scott Douglas Redmond (<http://scottredmond.net>) to participate on behalf of XP Vehicles, and other Plaintiffs including Limnia, Inc. and other victims of these attacks which continue to this day and restart the time-bar every morning that the attacking material is broadcast globally by Gawker. 18 additional operating entities will engage in follow-up litigation, one after the other, until restitution has been provided and the attacks cease. This matter will not cease for decades until Gawker pays their dues. Family members and WIKI staff have sworn, warranted and guaranteed to prosecute this matter even if XP Vehicles staff are no longer alive. Defendants must resolve this matter now. Please have Chantel instruct XP by email as to how XP can participate in the Jan. 26 hearing by phone if XP cannot secure a lawyer by then.

**WHEREAS** XP Vehicles is affiliated with the "Independent" political party and not the DNC or GOP and XP staff did, though, witness senior DNC officials engage in crimes, XP has been assured that the incoming Trump Administration will be delighted to deploy every legal resource along with the White House allocated \$500 million PR and media outreach budget to address any illicit deeds by Defendants. If this matter is not resolved by the time the Trump Administration moves into the White House, XP will provide the new White House and agency staff with substantial information and directional resources to assist the new Administration with activity and budget allocation which will be beneficial to the voting public, law enforcement and XP.

**WHEREAS**, Defendants are documented by advisors, whistle-blowers and consultants from law enforcement, defense, civil investigation, insider reporters from such as publications as TECH CRUNCH, The Daily Mail, ICIJ, Drudge Report, etc. and intelligence entities as being the persons and parties who did engage in the following attacks on Plaintiffs and said attacks can be tracked back to Defendants via forensic data and said attacks by Defendants threatened the lives, brands, incomes, careers, safety, security, and other metrics of Plaintiffs:

Defendants produced a series of attack videos, articles, blog comments and documents and sent them directly to the spouses, partners, landlords, investors, employers, news media and others in an effort to "vaporize" Plaintiffs as part of the reprisal, vendetta, retribution services which Defendants offered and accepted employment to engage in. Defendants published these attack materials to over 5 billion people for over 5 years in hopes of "destroying" Plaintiffs.

- Defendants contacted Social Security, SSI, SDI, Disability and other earned benefits services and caused them to be stonewalled. Applications were "lost". Files in the application process "disappeared". Lois Lerner hard drive "incidents" took place.

Corrupt state and federal employees worked with Defendants to play an endless game of Catch22 by arbitrarily determining that deadlines had passed that they, the government officials, had stonewalled and obfuscated applications for, in order to force these deadlines that they set, to appear to be missed.

Some applicants found themselves strangely poisoned, not unlike the Alexander Litvenko case. Heavy metals and toxic materials were found right after their work with the Department of Energy weapons and energy facilities. Many wonder if these “targets” were intentionally exposed to toxins in retribution for their testimony. The federal MSDS documents clearly show that a number of these people were exposed to deadly compounds and radiations.

Applicants employers were called, and faxed, and ordered to fire applicants from their places of employment, in the middle of the day, with no notice, as a retribution tactic.

Applicants HR and employment records, on recruiting and hiring databases, were embedded with negative keywords and links to Defendants servers in order to prevent them from gaining future employment.

Peers Gary D. Conley and Rajeev Motwani, both whistleblowers in this matter, turned up dead under strange circumstances. They are not alone in a series of bizarre deaths related to this matter.

Paypal, owned by Gawker backer Pierre Omidyar, and other online payments for online sales were delayed, hidden, or redirected in order to terminate income potential for applicants who competed with Defendants interests and holdings.

DNS redirection, website spoofing which sent applicants websites to dead ends and other Internet activity manipulations were conducted.

Campaign finance dirty tricks contractors INQTel, Think Progress, Media Matters, Gawker Media, Syd Blumenthal, etc., were hired and proven to have all been financially connected to Defendants. Executives and their campaign financiers to attack applicants who competed with Defendant executives stocks and personal assets.

Covert Defendant partner: Google, transferred large sums of cash to dirty tricks contractors and then manually locked the media portion of the attacks into the top lines of the top pages of all Google searches globally, for years, with hidden embedded codes in the links and web-pages which multiplied the attacks on applicants by many magnitudes.

Honeytraps and moles were employed by the attackers. In this tactic, people who covertly worked for the attackers were employed to approach the “target” in order to spy on and misdirect the subject. Vanity Fair produced a feature article about one such attack on the Founder of Tech Crunch, a peer.

Mortgage and rental applications had red flags added to them by Defendants in databases to prevent the targets from getting homes or apartments.

McCarthyEra "Blacklists" were created and employed against applicants who competed with Defendants executives and their campaign financiers to prevent them from funding and future employment.

Targets were very carefully placed in a position of not being able to get jobs, unemployment benefits, disability benefits or acquire any possible sources of income. "

The above list is only a partial set of examples of the attacks by Defendants.

**WHEREAS**, Defendants attacking entities, for whom law enforcement and intelligence surveillance records exist, are, at least, known to include Defendants employees and contractors: Adam Dachis, Adam Weinstein, Adrian Covert, Adrien Chen, Alan Henry, Albert Burneko, Alex Balk, Alexander Pareene, Alexandra Philippides, Allison Wentz, Andrew Collins, Andrew Magary, Andrew Orin, Angelica Alzona, Anna Merlan, Ariana Cohen, Ashley Feinberg, Ava Gyurina, Barry Petchesky, Brendan I. Koerner, Brendan O'Connor, Brent Rose, Brian Hickey, Camila Cabrer, Choire Sicha, Chris Mohney, Clover Hope, Daniel Morgan, David Matthews, Diana Moskovitz, Eleanor Shechet, Elizabeth Spiers, Elizabeth Starkey, Emily Gould, Emily Herzog, Emma Carmichael, Erin Ryan, Ethan Sommer, Eyal Ebel, Gabrielle Bluestone, Gabrielle Darbyshire, Georgina K. Faircloth, Gregory Howard, Hamilton Nolan, Hannah Keyser, Hudson Hongo, Heather Deitrich, Hugo Schwyzer, Hunter Slaton, Ian Fette, Irin Carmon, James J. Cooke, James King, Jennifer Ouellette, Jesse Oxfeld, Jessica Cohen, Jesus Diaz, Jillian Schulz, Joanna Rothkopf, John Cook, John Herrman, Jordan Sargent, Joseph Keenan Trotter, Josh Stein, Julia Allison, Julianne E. Shepherd, Justin Hyde, Kate Dries, Katharine Trendacosta, Katherine Drummond, Kelly Stout, Kerrie Uthoff, Kevin Draper, Lacey Donohue, Lucy Haller, Luke Malone, Madeleine Davies, Madeline Davis, Mario Aguilar, Matt Hardigree, Matt Novak, Michael Ballaban, Michael Dobbs, Michael Spinelli, Neal Ungerleider, Nicholas Aster, Nicholas Denton, Omar Kardoudi, Pierre Omidyar, Owen Thomas, Patrick George, Patrick Laffoon, Patrick Redford, Rich Juzwiak, Richard Blakely, Richard Rushfield, Robert Finger, Robert Sorokanich, Rory Waltzer, Rosa Goljan, Ryan Brown, Ryan Goldberg, Sam Faulkner Bidle, Sam Woolley, Samar Kalaf, Sarah Ramey, Shannon Marie Donnelly, Shep McAllister, Sophie Kleeman, Stephen Totilo, Tamar Winberg, Taryn Schweitzer, Taylor McKnight, Thorin Klosowski, Tim Marchman, Timothy Burke, Tobey Grumet Segal, Tom Ley, Tom Scocca, Veronica de Souza, Wes Siler, William Haisley, William Turton at a minimum but not to be limited by this law enforcement list and shall be placed on permanent surveillance by Plaintiff contractors, law enforcement and news organizations until such time as this matter is resolved.

**WHEREAS** further information provided in the 7 other related federal cases that this Court has been notified of provide further confirming evidence.

**WHEREAS** financial tracking of the financiers, beneficiaries and means of operations communications prove that a RICO-qualified Cartel was operated by Defendants.

**PLEASE TAKE FURTHER NOTICE** that copies of any motions scheduled for hearing on the omnibus dates may be obtained free of charge by visiting the website of the Debtors' claims and noticing agent, Prime Clerk LLC, at <https://cases.primeclerk.com/gawker>.

You may also obtain copies of any pleadings by visiting the Court's website at <http://nysb.uscourts.gov> in accordance with the procedures and fees set forth therein. You may also obtain copies of non-classified evidence for this case at <http://www.globalscoop.net> Case # 2788-D in folders # A-1 through A-50.

## PROOF OF SERVICE

Plaintiffs group hereby certifies that on this date we caused this filing to be served via a true and correct copy of the foregoing by causing copies of same to be served on all counsel of record, all known creditors, federal law enforcement liaisons and on the U.S. Trustee for the Southern District of

New York, Region 2, by electronic filing same via electronically traced and tracked digital networking and using the Prime Clerk case system and the Judge's office electronic filing system.

### BCC: FBI, U.S. Congress, FTC, SEC, OSC, GAO, INTERPOL

The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

1The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

On 01/03/2017 09:43 AM, [Chantel\\_Barrett@nysb.uscourts.gov](mailto:Chantel_Barrett@nysb.uscourts.gov) wrote:

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| Order to Show Cause Signed On 1/3/2017. Re: Directing Filing Of Statement  
Pursuant To |  
| Federal Bankruptcy Rule 2019 As A Condition To Being Heard with hearing to  
be held on |  
| 1/26/2017 at 10:00 AM at Courtroom 723  
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(See attached file: 16-11700 Gawker XP.pdf)

(Embedded image moved to file: pic19963.gif)

Chantel Barrett  
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